

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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AUG 5 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 98-198
Table of Allotments)	RM-9304, RM-9492, RM-9524,
FM Broadcast Stations)	RM-9547, RM-9548, RM-9690
(Cross Plains, Texas et al.))	

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

SECOND REPLY COMMENTS

Hispanic Broadcasting Corporation (formerly Heftel Broadcasting Corporation) ("Hispanic"), Metro Broadcasters-Texas, Inc. ("Metro"), Jerry Snyder and Associates, Inc. ("JSA") and Hunt Broadcasting, Inc. ("Hunt") (collectively "Joint Parties"), by their respective counsel, hereby submit reply comments pursuant to the Commission's Public Notice in the above-captioned proceeding.¹ The purpose of this reply is to update the record in this proceeding and provide certain corrections to the Commission's FM Engineering Data Base. The proposal of Gulfwest Broadcasting Co. and Sonoma Media Corp. in this proceeding has been withdrawn.² In addition, the conflicting proposal of ALALATEX has been withdrawn. Previously, the Joint Parties had asked for this Counterproposal to be severed from the remaining proposals in this docket. The Joint Parties hereby renew that request. There is no impediment to the severance and immediate grant of this Counterproposal.

1. Report No. 2346 (July 21, 1999), as corrected (July 29, 1999).

2. See Motion to Withdraw and Dismiss Counterproposal (filed Aug. 3, 1999).

O+U

I. New Channel 246A, Snyder, TX.

The Commission's FM Engineering Data Base fails to include entries proposing to substitute Channel 249A for Channel 246A at the application sites of three of the four applicants for this vacant allotment. The three sites are 32° 44' 20" North Latitude, 100° 54' 06" West Longitude (Highland application); 32° 45' 23" North Latitude, 100° 54' 09" West Longitude (Delbert Foree application); 32° 46' 52" North Latitude, 100° 53' 52" West Longitude (Frances Beane application). *See* Exhibit E, Figures 2-5. Since these three application sites differ from the Snyder reference point, it is appropriate to protect each of the sites until one is selected.

II. KKEN, Duncan, OK.

The Data Base contains incorrect reference coordinates in the substitution of 246A for Channel 272A for Station KKEN, Duncan Oklahoma. The correct coordinates, as listed in the Public Notice, are **34° 30' 43" North Latitude, 97° 58' 05" West Longitude**. *See* Exhibit E, Figure 1.

III. Station KHYI, Howe, Texas

In MM Docket No. 97-26, Metro proposed to substitute Channel 237C2 for Channel 237C3 at Howe, Texas for Station KHYI. That substitution conflicted with the current allotment of Channel 238C2 at Hugo, Oklahoma. The Joint Parties' Counterproposal proposes to change the reference coordinates for the Channel 237C2 allotment at Howe, thus eliminating the conflict with Hugo. As the amended Public Notice correctly indicates, the Howe upgrade can be granted in this proceeding. Metro hereby reaffirms its interest, initially expressed in Docket 97-26, in applying for the channel and constructing the upgraded facility should the Commission grant the proposed substitution.

IV. Station KYXS, Mineral Wells, Texas

JSA has an application pending for Channel 240C1 at Mineral Wells, Texas. This application conflicted with a proposal in MM Docket 97-91 to allot Channel 237A to Jacksboro, Texas for Station KJKB. The Joint Parties' Counterproposal proposes to change the reference coordinates for the Channel 240C1, removing the conflict. However, the Commission's Data Base lists the coordinates for Channel 240C3 instead of 240C1. JSA's application for Channel 240C1 is on file with the Commission (File No. BPH-961125IG). JSA hereby reaffirms its continuing interest in the application and constructing the facility in compliance with the Commission's rules based on the new reference coordinates should the Commission grant this proposal.

CONCLUSION

By permitting Channel 300C2 to be reallocated to Lewisville in MM Docket No. 97-91, grant of this Counterproposal would enable an additional net gain in service to 3,248,422 persons as well as a first local service.³ In addition, as demonstrated in the Joint Parties' Counterproposal, grant of the Counterproposal would provide new 60 dBu service to an additional 125,922 persons in an area of 10,852 square kilometers. No conflicting proposals remain in this proceeding, and the public

3. See Report and Order in MM Docket No. 97-91, 13 FCC Rcd 15591, 15594 (1998).

interest would be served by the severance and immediate grant of the Counterproposal, together with the requested changes to Station KHYI, Howe, Texas and KYXS, Mineral Wells, Texas.

Respectfully submitted,

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4. New address and telephone number.

Engineering Statement

In Support of

Second Reply Comments

MM Docket 98-198

**Hispanic Broadcasting Corporation
Metro Broadcasters-Texas, Inc.
Jerry Snyder and Associates, Inc.
Hunt Broadcasting, Inc.**

The instant engineering statement is submitted in support of the counterproposal in the above captioned docket that was filed by Hispanic Broadcasting Corporation (formerly Heftel Broadcasting Corporation); Metro Broadcasters-Texas, Inc.; Jerry Snyder and Associates, Inc.; and Hunt Broadcasting, Inc. (collectively known as "Joint Parties"). There are some changes in the Commission's technical database that have a direct bearing on the implementation of the Joint Parties counterproposal. These errors need to be corrected. In addition, the Public Notice (Report Number 2346) and the Commission's technical database contain minor omissions that should be corrected.

Each station listed in the counterproposal is discussed individually. Any needed corrections or omissions are noted in the discussion of the appropriate station:

1. ***KHYI, Howe, Texas.*** All references in the Commission's Public Notice and database concerning the deletion of channel 237C3 and the substitution of channel 237C2 for use by KHYI are correct.
2. ***KJKB, Jacksboro, Texas.*** All references in the Commission's Public Notice and database concerning the deletion of channel 237A and the substitution of channel 238A for use by KJKB are correct.
3. ***KVRP, Haskell, Texas.*** A channel study in the current database for substitute channel 246C1 at the licensed site of KVRP shows a short space of 1.53 kilometers to the substitution of channel 246A for channel 272A at Duncan, Oklahoma. However, the reference coordinates for AD246A at Duncan are incorrect in the database. When the correct coordinates for Duncan are used,

there is no short space to channel 246C1 at the licensed site of KVRP at Haskell. The Joint Parties, in its original counterproposal, made request to the Commission to issue a show-cause order to the licensee of KVRP concerning the substitution of channel 246C1 for channel 238C1 at the licensed site of KVRP.

4. ***AP246A, Snyder, Texas.*** The Commission's Public Notice lists only one entry for the substitution of channel 249A at Snyder, Texas. It uses the allotment reference coordinates. The application sites for each applicant were included in the original Joint Parties counterproposal. The listing of each applicant with the substitute channel of 249A should be included in the Public Notice in order to provide spacing protection. The Commission's database lists the substitution of channel 249A for channel 246A using one applicant's reference site. However, it does not acknowledge the proposed substitution at the remaining 3 applicants' sites or the channel 246A allotment reference coordinates at Snyder. As noted in above concerning the Public Notice, these entries should be in the database to provide spacing protection for each applicant.
5. ***AL246A, Eldorado, Oklahoma.*** All references in the Commission's Public Notice and database concerning the deletion of channel 246A and the substitution of channel 245A for use by future applicants are correct.
6. ***KKAJ, Ardmore, Oklahoma.*** The Joint Parties proposed to modify the reference coordinates of KKAJ to a site that gave clearance to the KHYI and KJKB modifications. That reference change is listed in the Commission's database, but it is not listed in the Public Notice.
7. ***KYXS, Mineral Wells, Texas.*** The Joint Parties proposed a reference coordinates change for the allotment of channel 240C1 at Mineral Wells in order to accommodate the allotment of channel 238A for channel 237A at Jacksboro. This proposed reference change is not listed in the Public Notice and appears in the Commission's database as a proposed allotment of channel 240C3 instead of channel 240C1. However, the reference coordinates in the database are correct.

Exhibits Explained

Exhibit E, Figure 1 is an allocation study using the licensed site of KVRP, Haskell, Texas as reference. The channel considered is 246C1. As discussed previously, the study shows a 1.53-kilometer short space to the proposed substitution of channel 246A at Duncan, Oklahoma that was proposed in an inter-related and parallel counterproposal. This study also lists the substitution of channel 246A for channel 272A at Duncan using

the correct coordinates. It shows that there is no short space when the correct Duncan Coordinates are used.

Exhibit E, Figures 2 through 5 are channel studies for the four applicants at Snyder, Texas. These studies were provided in the original counterproposal using each applicant's reference coordinates and channel 249A. The Joint Parties respectfully request that each Snyder applicant's reference coordinates be included in the database, so as to afford them spacing protection.

Exhibit E, Figure 6 is an allocation study using the requested the Wagonwheel allotment coordinates for channel 288C3 in lieu of channel 290C2, per their withdrawal of interest in channel 290C2 at Santa Anna, Texas. This study reveals that there are no conflicts between any of the Joint Parties' options in MM Docket 98-198 and the allotment of channel 288C3 at Santa Anna.

Conclusion

The instant engineering statement supports the Joint Parties reply concerning minor changes needed in the Commission's Public Notice and database necessary to bring them into agreement with the Joint Parties counterproposal. As shown in the original counterproposal, the Joint Parties' proposal will add a new 60-dBu service to a net population of 125,922 persons and a net area of 10,852 square kilometers.

The Joint Parties are aware that other conflicting counterproposals in MM Docket 98-198 have been withdrawn. Those counterproposals are the ones submitted by Sonoma Media Corporation/Gulfwest Broadcasting Company and Wagonwheel Broadcasting of Santa Anna. These withdrawals and modifications have eliminated all conflict in MM Docket 98-198. However, even when the conflict still existed, it had no direct bearing on the implementation of the Joint Parties' request.

Now that ALALATEX has withdrawn its request for channel 245C3 at Cross Plains, Texas, the Joint Parties' counterproposal is totally without conflict. Therefore, the Commission can adopt the Joint Parties' counterproposal separate from other counterproposal in MM Docket 98-198 and bring a global resolution to MM Dockets 97-26 and 97-91.

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 246C1 (KVRP) HASKELL, TX
[DEPICTING SPACING FOR USE OF CH 246C1 AT KVRP.L SITE]
(USING KVRP LICENSED SITE AS REFERENCE)

33 09 40 N. Class C1 Search Date
99 48 57 W. Current rules spacings 08-04-99

----- Channel 246 - 97.1 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
------	-----	------	-------	-------	-------	-------	--------

AD246	246C1	Haskell	TX	0.0	0.00	245.0	-245.00 *
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Of Note:

Substitution Proposed by
Joint Parties in Original
Counterproposal (MM Docket 98-198)

AP246	246A	Snyder	TX	247.4	109.57	200.0	-90.43 *
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AP246	246A	Snyder	TX	246.2	111.07	200.0	-88.93 *
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AP246	246A	Snyder	TX	245.2	111.81	200.0	-88.19 *
-------	------	--------	----	-------	--------	-------	----------

DE246	246A	Snyder	TX	244.5	114.13	200.0	-85.87 *
-------	------	--------	----	-------	--------	-------	----------

ALOPEN	246A	Snyder	TX	244.5	114.13	200.0	-85.87 *
--------	------	--------	----	-------	--------	-------	----------

Of Note:

Substitution of Channel 249A
For Channel 246A Proposed by
Joint Parties in Original
Counterproposal (MM Docket 98-198)

DE246	246A	Eldorado	OK	6.1	146.37	200.0	-53.63 *
-------	------	----------	----	-----	--------	-------	----------

ALOPEN	246A	Eldorado	OK	6.1	146.37	200.0	-53.63 *
--------	------	----------	----	-----	--------	-------	----------

DE246	246A	Eldorado	OK	6.1	146.37	200.0	-53.63 *
-------	------	----------	----	-----	--------	-------	----------

Of Note:

Substitution of Channel 245A for
Channel 246A Proposed by Joint
Parties in Original Counterproposal
(MM Docket 98-198)

DE245	245C3	Crossplains	TX	152.8	128.78	144.0	-15.22 *
-------	-------	-------------	----	-------	--------	-------	----------

AD245	245C3	Cross Plains	TX	152.8	128.78	144.0	-15.22 *
-------	-------	--------------	----	-------	--------	-------	----------

DE245	245C3	Crossplains	TX	152.8	128.78	144.0	-15.22 *
-------	-------	-------------	----	-------	--------	-------	----------

DE245	245C3	Cross Plains	TX	152.8	128.78	144.0	-15.22 *
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Of No Concern:

All Expressions of Interest in Channel 245C3
At Cross Plains Have Been Withdrawn by Original
Petitioner.

Continued on the next page

33 09 40 N. Class C1 Search Date
 99 48 57 W. Current rules spacings 08-04-99

----- Channel 246 - 97.1 MHz -----
 Call Ch# City State Bear' Dist' R'grd Margin

AD246 246A Duncan OK 59.8 198.47 200.0 -1.53 *

Of Concern:
 Incorrect Reference Coordinates
 In the Database and Public Notice
 (See Below for Correct Spacing)

AD245 245C1 Brownwood TX 154.6 178.77 177.0 1.77 *

DE245 245C1 Brownwood TX 154.6 178.77 177.0 1.77 *

AD245 245C1 Brownwood TX 154.6 178.77 177.0 1.77 *

Of Note:
 Substitution Proposed in Other
 MM Cokcet 98-198 Counterproposals

KEGL.C 246C Fort Worth TX 103.4 273.97 270.0 3.97 *

AD245 245A Eldorado OK 6.1 146.37 133.0 13.37

KXOXFM 244A Sweetwater TX 215.8 92.12 75.0 17.12

KRZB.C 248C2 Olney TX 77.1 103.18 79.0 24.18

DE246 246A Comanche OK 51.2 225.57 200.0 25.57

KDDQ.C 246A Comanche OK 51.2 225.97 200.0 25.97

AD246 246A Duncan OK 48.8 227.38 200.0 27.38

Of Note:
 Correct Reference for Substitution
 Of Channel 246A for Channel 272A
 At Duncan, Oklahoma
 Correct Coordinates Are:
 NL: 34-30-43; WL: 97-58-05

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 249A (AL246A) SNYDER, TX
[DEPICTING SPACING FOR USE OF CH249A AT AL246A SITE]
(USING AL246A ALLOTMENT SITE AS REFERENCE)

32 43 04 N.			Class A				Search Date
100 55 02 W.			Current rules spacings				08-04-99
----- Channel 249A - 97.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin

AD249	249A	Snyder	TX	0.0	0.00	115.0	-115.00 *
Of Note: Substitution of CH249A for CH246A by Joint Parties In the Original Counterproposal (MM Docket 98-198)							
DE246	246A	Snyder	TX	0.0	0.00	31.0	-31.00 *
ALOPEN	246A	Snyder	TX	0.0	0.00	31.0	-31.00 *
Of No Concern: Allotment Reference for CH246A At Snyder, TX							
AP246	246A	Snyder	TX	31.9	2.76	31.0	-28.24 *
AP246	246A	Snyder	TX	17.9	4.50	31.0	-26.50 *
AP246	246A	Snyder	TX	14.5	7.26	31.0	-23.74 *
Of Note: Reference Sites of Applicants For CH246A at Snyder, TX							
KGKLFM	248C1	San Angelo	TX	160.7	143.55	133.0	10.55
KODM	250C1	Odessa	TX	229.3	156.90	133.0	23.90
KKHR.A	251C1	Anson	TX	93.5	99.80	75.0	24.80
AD246	246C1	Haskell	TX	64.5	114.13	75.0	39.13
ALOPEN	251C1	Anson	TX	105.3	115.15	75.0	40.15
KKHR	251C2	Anson	TX	93.5	99.93	55.0	44.93

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 249A (AP246A) SNYDER, TX
[DEPICTING SPACING FOR USE OF CH249A AT AP246A SITE]
(USING AP246A APPLICATION SITE OF DELBERT R. FOREE AS REFERENCE)

32 43 04 N.			Class A				Search Date
100 55 02 W.			Current rules spacings				08-04-99
----- Channel 249A - 97.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

AD249	249A	Snyder	TX	197.9	4.50	115.0	-110.50 *
Of Note: Substitution of CH249A for CH246A by Joint Parties In the Original Counterproposal (MM Docket 98-198)							
AP246	246A	Snyder	TX	0.0	0.00	31.0	-31.00 *
AP246	246A	Snyder	TX	177.7	1.94	31.0	-29.06 *
AP246	246A	Snyder	TX	9.2	2.78	31.0	-28.22 *
Of Note: Reference Sites of Applicants For CH246A at Snyder, TX							
ALOPEN	246A	Snyder	TX	197.9	4.50	31.0	-26.50 *
DE246	246A	Snyder	TX	197.9	4.50	31.0	-26.50 *
Of No Concern: Allotment Reference for CH246A At Snyder, TX							
KGKLFM	248C1	San Angelo	TX	161.7	147.16	133.0	14.16
KKHR.A	251C1	Anson	TX	96.0	98.75	75.0	23.75
KODM	250C1	Odessa	TX	228.4	160.74	133.0	27.74
AD246	246C1	Haskell	TX	66.2	111.07	75.0	36.07
ALOPEN	251C1	Anson	TX	107.5	115.01	75.0	40.01
KKHR	251C2	Anson	TX	96.0	98.89	55.0	43.89

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 249A (AP246A) SNYDER, TX
[DEPICTING SPACING FOR USE OF CH249A AT AP246A SITE]
(USING AP246A APPLICATION SITE OF HIGHLAND BROADCASTERS AS REFERENCE)

32 43 04 N.	Class A					Search Date
100 55 02 W.	Current rules spacings					08-04-99
-----			Channel 249A - 97.7 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd Margin

AD249	249A	Snyder	TX	211.9	2.76	115.0 -112.24 *
Of Note:						
Substitution of CH249A for						
CH246A by Joint Parties						
In the Original Counterproposal						
(MM Docket 98-198)						
AP246	246A	Snyder	TX	0.0	0.00	31.0 -31.00 *
AP246	246A	Snyder	TX	357.7	1.94	31.0 -29.06 *
Of Note:						
Reference Sites of Highland Broadcasters						
And Delbert R. Foree						
For CH246A at Snyder, TX						
ALOPEN	246A	Snyder	TX	211.9	2.76	31.0 -28.24 *
DE246	246A	Snyder	TX	197.9	4.50	31.0 -26.50 *
Of No Concern:						
Allotment Reference for CH246A						
At Snyder, TX						
AP246	246A	Snyder	TX	4.4	4.70	31.0 -26.30 *
Of Note:						
Reference Site of Frances Beane						
For CH246A at Snyder, TX						
KGKLFM	248C1	San Angelo	TX	161.5	145.29	133.0 12.29
KKHR.A	251C1	Anson	TX	94.9	98.50	75.0 23.50
KODM	250C1	Odessa	TX	229.0	159.53	133.0 26.53
AD246	246C1	Haskell	TX	65.2	111.81	75.0 36.81
ALOPEN	251C1	Anson	TX	106.6	114.38	75.0 39.38
KKHR	251C2	Anson	TX	94.9	98.63	55.0 43.63

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 249A (AP246A) SNYDER, TX
[DEPICTING SPACING FOR USE OF CH249A AT AP246A SITE]
(USING AP246A APPLICATION SITE OF FRANCES BEANE AS REFERENCE)

32 43 04 N.			Class A				Search Date	
100 55 02 W.			Current rules spacings				08-04-99	
-----			Channel 249A - 97.7 MHz				-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	

AD249	249A	Snyder	TX	194.5	7.26	115.0	-107.74 *	
Of Note:								
Substitution of CH249A for								
CH246A by Joint Parties								
In the Original Counterproposal								
(MM Docket 98-198)								
AP246	246A	Snyder	TX	0.0	0.00	31.0	-31.00 *	
AP246	246A	Snyder	TX	189.2	2.78	31.0	-28.22 *	
AP246	246A	Snyder	TX	184.4	4.70	31.0	-26.30 *	
Of Note:								
Reference Sites of Applicants								
For CH246A at Snyder, TX								
ALOPEN	246A	Snyder	TX	194.5	7.26	31.0	-23.74 *	
DE246	246A	Snyder	TX	194.5	7.26	31.0	-23.74 *	
Of No Concern:								
Allotment Reference for CH246A								
At Snyder, TX								
KGKLFM	248C1	San Angelo	TX	162.2	149.62	133.0	16.62	
KKHR.A	251C1	Anson	TX	97.6	98.62	75.0	23.62	
KODM	250C1	Odessa	TX	227.8	162.89	133.0	29.89	
AD246	246C1	Haskell	TX	67.4	109.57	75.0	34.57	
ALOPEN	251C1	Anson	TX	108.9	115.43	75.0	40.43	
KKHR	251C2	Anson	TX	97.6	98.76	55.0	43.76	

ENGINEERING STATEMENT

In Support of

Second Reply Comments

MM Docket 98-198

The Joint Parties

ALLOCATION STUDY - CHANNEL 288C3 (AD290C2) SANTA ANNA, TEXAS
[DEPICTING SPACING FOR USE OF CH 288C3 AT NEW ALLOTMENT SITE]
(GIVING CLEARANCE TO ALL OTHER MODIFICATIONS IN MM DOCKET 98-198)

31 37 38 N.			Class C3				Search Date
99 20 03 W.			Current rules spacings				08-04-99
----- Channel 288A -105.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

Community of Santa Anna			TX	4.1	12.26		
Reference Coordinates:							
North Latitude: 31-44-15							
West Longitude: 99-19-30							
AD290 290C2 Santa Anna			TX	3.2	12.71	56.0	-43.29 *
Of No Concern:							
Previous Proposed Allotment							
By Wagonwheel. Request Withdrawn.							
KEANFM	286C1	Abilene	TX	341.2	76.05	76.0	0.05 *
KYUL	288C2	Harker Heights	TX	113.7	177.06	177.0	0.06 *
KEANFM	286C1	Abilene	TX	341.1	76.06	76.0	0.06 *
AD290	290C3	Cross Plains	TX	13.9	57.25	43.0	14.25
AD290	290C3	Crossplains	TX	13.9	57.25	43.0	14.25
AD290	290C3	Crossplains	TX	13.9	57.25	43.0	14.25
KMDX.C	289C3	San Angelo	TX	259.7	119.17	99.0	20.17
KEANFM	286C1	Abilene	TX	335.7	100.22	76.0	24.22
AD291	291A	San Saba	TX	129.4	76.21	42.0	34.21

Statement of the Consultants

The engineering section for the instant document was prepared Hispanic Broadcasting Corporation; Metro Broadcasters-Texas, Inc.; Jerry Snyder and Associates, Inc.; and Hunt Broadcasting, Inc. ("Joint Parties") and supports its 2nd reply comments in MM Docket 98-198. It was developed by Lee S. Reynolds and Paul H. Reynolds of Reynolds Technical Associates ("RTA") and may not be used for purposes other than submission to the Commission by Joint Parties.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:



Lee S. Reynolds

August 4th 1999

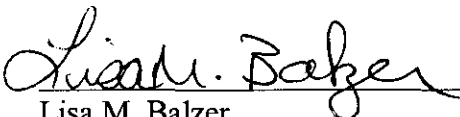
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CERTIFICATE OF SERVICE

I, Lisa M. Balzer, do hereby certify that on this 5th day of August, 1999, copies of the foregoing **Reply Comments** were mailed, postage prepaid, to the following:

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